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20 *Attorneys for Plaintiff Houston Casualty Company*

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 Houston Casualty Company,  
24 a foreign Corporation,

25 Plaintiff

26 vs.

27 Findlay Management Group., a Nevada  
28 Domestic Corporation,

Defendant.

CASE NO. 2:24-cv-01459-GMN-NJK

**ORDER TO EXTEND DEADLINE  
FOR FILING OF DISCOVERY  
PLAN**

**(FIRST REQUEST)**

Plaintiff, Houston Casualty Company (“HCC”), on the one hand, and Defendant, Findlay Management Group (“Findlay”), on the other hand, by and through their respective undersigned attorneys of record, hereby stipulate and agree to extend the deadline to file a discovery plan in

1 this case. The current deadline for filing the discovery plan is November 28, 2024. This is the  
2 first request for an extension of time concerning this deadline.

- 3 1. On August 9, 2024, Plaintiff filed its Complaint (ECF No. 1) against Defendant,  
4 which was not served on Defendant.
- 5 2. On August 28, 2024, Plaintiff filed its Amended Complaint against Defendant  
6 (ECF No. 5).
- 7 3. On September 3, 2024, Defendant was served with Plaintiff's Amended  
8 Complaint (ECF No. 5) and the Summons (ECF No. 12).
- 9 4. The Court entered an order extending the deadline for Defendant to respond to  
10 the Amended Complaint for thirty (30) days (ECF No. 19).
- 11 5. Defendant filed its Answer and Counterclaims on October 24, 2024 (ECF No.  
12 21).
- 13 6. On November 13, 2024, the parties filed a Stipulation and Proposed Order to  
14 extend time for Plaintiff to respond to Defendant's Answer and Counterclaims  
15 and/or to amend its Amended Complaint (ECF No. 23) for an additional twenty-  
16 two (22) days, up to and including December 6, 2024.
- 17 7. On November 15, 2024, the Court entered an order granting the Stipulation for  
18 the Extension of Time (ECF 24). On November 14, 2024, the parties conducted a  
19 Rule 26(f) conference on Microsoft Teams and discussed a discovery plan. The  
20 parties require additional time to consider each other's positions concerning  
21 discovery.  
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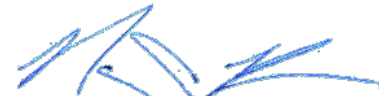
23 Among other things, additional time will allow the parties to submit a  
24 discovery plan that includes all of their respective claims and counterclaims  
25 given Plaintiff's forthcoming Second Amended Complaint, which may change  
26 the landscape of potential discovery in this case. Further, it would be a waste of  
27 resources of both the parties and this Court for a discovery plan to be submitted  
28 now and then revised shortly thereafter. Further, additional time will account for

1 intervening holidays that might otherwise subtract from the discovery period.

- 2 8. Accordingly, the parties request up to and including January 10, 2025, to file  
3 their discovery plan and for such discovery plan deadlines to track from the date  
4 the Defendant answers Plaintiff's anticipated Second Amended Complaint.
- 5 9. The parties also agree that their respective Rule 26 Initial Disclosures shall be  
6 produced within fourteen (14) days of the submission of the parties' discovery  
7 plan, assuming no motion to stay discovery has been filed.
- 8 10. Nothing in this stipulation shall constitute a waiver of either party's right to file a  
9 motion to stay discovery or otherwise seek to modify the standard discovery  
10 plan. Nor shall this stipulation constitute a waiver of either party's rights to  
11 oppose any stay of discovery or other relief sought by the other party.
- 12 11. Good cause exists to grant this stipulation and it is submitted in good faith, is not  
13 interposed for delay, and is not filed for an improper purpose.  
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15 **IT IS SO ORDERED.**

16 DATED: November 27, 2024

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20 NANCY J. KOPPE  
21 UNITED STATES MAGISTRATE JUDGE  
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